

TIMOTHY LAMONT SAUNDERS, GARY
GRAHAM SWENCHONIS JR., ANDREW
TRIPLETTT, AND CRAIG BRYAN WIBBERLY,

Petitioners,

-against-

ABN-AMRO BANK N.V., AMERICAN EXPRESS
BANK LTD., BANK OF NEW YORK, BANK OF
CHINA, CITIBANK N.A., DEUTSCHE BANK
A.G., DEUTSCHE BANK TRUST COMPANY
AMERICAS, HSBC BANK USA, N.A., and
JPMORGAN CHASE BANK N.A.,

Respondents.

DEUTSCHE BANK A.G. and DEUTSCHE BANK
TRUST COMPANY AMERICAS

Respondents and Third-
Party Petitioners,

-against-

AL HADHA EXCHANGE, AL JAZIRAH
ENTERPRISE FOR PROJECTS DEVELOPMENT
AND TRADING - TRANSPORT, AL MABARA
TRADING EST., ALBANK ALSAUDI ALFRANSI
(also known as BANQUE SAUDI FRANSI d/b/a
SAUDI FRENCH BANK), ARAB BANK PLC.,
BANK OF INDIA, BANK OF KHARTOUM, BANK
OF SUDAN, BANQUE BELGOLAISE PARIS,
BANQUE NATIONALE DE PARIS,
BELGOLAISE, BNP PARIBAS, BNP PARIBAS
S.A., BNP PARIBAS SUISSE SA, BRITISH ARAB
COMMERCIAL BANK LTD., BYBLOS BANK
EUROPE S.A., CALYON LONDON (formerly
known as CREDIT LYONNAIS LONDON),
CALYON NY (formerly known as CREDIT
LYONNAIS NY), COMMERZBANK AG, CREDIT
LIBANAIS SAL, CREDIT SUISSE FIRST
BOSTON, CREDIT SUISSE, EL NILEIN
INDUSTRIAL DEVELOPMENT BANK (also

known as EL NILEIN BANK), EMIRATES BANK	:
INTERNATIONAL, ETS LA CONCORDE,	:
FAISAL ISLAMIC BANK OF EGYPT, FARMERS	:
COMMERCIAL BANK, FEDERAL EXCHANGE	:
DUBAI; FIRST INTERNATIONAL MERCHANT	:
BANK, GENERALE BANK, HSBC BANK PLC,	:
KENANA SUGAR CO. LTD., LIBERTY	:
INVESTMENT COMPANY, LLC., M/S SABENA,	:
MALAYAN BANKING BERHAD (also known as	:
MAYBANK), NATIONAL BANK OF ABU DHABI	:
(also known as N.B.A.D. KHARTOUM),	:
NATIONAL BANK OF SHARJAH (also known as	:
SHARJAH ISLAMIC BANK), NATIONAL	:
ELECTRICITY CORP. (KHARTOUM AREA),	:
NATIONAL SOCIETE GENERALE BANK S.A.,	:
RICHMOND MERCANTILE LIMITED (FZC),	:
SAUDI BRITISH BANK (also known as SABB),	:
SOCIETE GENERALE, SUDAN AIRWAYS,	:
SUDAN SHIPPING LINE, SUDAN	:
TELECOMMUNICATION COMPANY LTD.,	:
SUDANESE FREE TRADE ZONE AND MARKET	:
COMPANY, SUDANESE FRENCH BANK, THE	:
SUDANESE PETROLEUM CORP., TELECOM	:
EGYPT SAE-INTERNATIONAL	:
COMMUNICATION SECTOR,	:
TRANSNATIONAL BANK LTD., UNITED	:
EUROPEAN BANK, AND UNITED OVERSEAS	:
BANK,	:
	:
	:
Third Party Respondents	:
and Adverse Claimants.	:
	x

BRENT T. STARKS declares as follows pursuant to 28 U.S.C. § 1746:

1. I am an attorney admitted to practice before this Court and an associate with the firm of Covington & Burling LLP, counsel for Deutsche Bank A.G. and Deutsche Bank Trust Company Americas' (hereinafter "Deutsche Bank") in the above-captioned action.
2. On October 21, 2008, I caused a copy of the "Notice to Potential Claimants to Certain Funds Blocked Pursuant to Sudanese Sanctions Regulations of the United

States Department of the Treasury” (hereinafter “the Notice”), approved by this Court on October 17, 2008 and attached as Exhibit A, to be published in the International Herald Tribune daily newspaper. The affidavit of publication, attached as Exhibit B, attests that the Notice appeared in the “Legal Notices” section of the International Herald Tribune on the following dates: October 23, 2008, October 30, 2008, November 6, 2008, and November 13, 2008. *See* Exhibit C

3. On or about October 31, 2008, I caused a banner advertisement with a hypertext link to the Notice to be displayed at the following website: www.allafrica.com between November 3, 2008 and November 21, 2008. *See* Exhibit D. The Banner advertisement read as follows:

NOTICE TO POTENTIAL CLAIMANTS TO CERTAIN FUNDS BLOCKED
PURSUANT TO SUDANESE SANCTIONS REGULATIONS OF THE
UNITED STATES DEPARTMENT OF THE TREASURY

See Exhibit E. Specifically, the website displayed a banner advertisement that linked the viewer to www.ruxlitigation.org, which contains the Notice in both English and Arabic. *See* Exhibits F, G. Under the terms of the advertising agreement reached with www.allafrica.com, the Banner advertisement was required to appear up to 400,000 times when (a) the www.allafrica.com site was accessed by a user in Sudan, or (b) a user, irrespective of location, accessed an article

concerning Sudan at www.allafrica.com/sudan/.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 18th day of December in New York, New York.

A handwritten signature in black ink, consisting of a stylized 'Z' shape followed by a horizontal line.

Brent T. Starks